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16 Attorneys for WAYMO LLC

17 UNITED STATES DISTRICT COURT

18 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

19 WAYMO LLC,

20 CASE NO. 3:17-cv-00939-WHA

21 Plaintiff,

22

23 vs.

24 **DECLARATION OF FELIPE
CORREDOR IN SUPPORT OF
PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
PORTIONS OF ITS OFFER OF PROOF
REGARDING DEFENDANTS' TRADE
SECRET MISAPPROPRIATION**

25 UBER TECHNOLOGIES, INC.;
26 OTTOMOTTO LLC; OTTO TRUCKING
27 LLC,

28 Defendants.

1 I, Felipe Corredor, declare as follows:

2 1. I am an attorney licensed to practice in the State of California and am admitted to
 3 practice before this Court. I am an associate at the law firm Quinn Emanuel Urquhart & Sullivan,
 4 LLP, counsel for the Plaintiff Waymo LLC (“Waymo”). I have personal knowledge of the matters set
 5 forth in this Declaration, and if called as a witness I would testify competently to those matters.

6 2. I make this declaration in support of Waymo’s Administrative Motion to File Under
 7 Seal Portions of Its Offer of Proof Regarding Defendants’ Trade Secret Misappropriation (“Waymo’s
 8 Offer of Proof”), filed concurrently herewith (the “Administrative Motion”). The Administrative
 9 Motion seeks an order sealing the following materials filed concurrently herewith:

| Document | Portions to Be Filed Under Seal | Designating Party |
|------------------------|-------------------------------------|---|
| Waymo’s Offer of Proof | Portions to be highlighted tomorrow | Waymo, Defendants, and third party Velodyne |

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 11 3. Specifically, certain portions of Waymo’s Offer of Proof contain or refer to trade secret
 12 information, which Waymo seeks to seal. Given the sensitivity of this material, Waymo is currently
 13 filing the entire document under seal but intends to provide a redacted version tomorrow.

14 4. Certain portions of Waymo’s Offer of Proof contain, reference, and/or describe
 15 Waymo’s trade secrets. The information Waymo seeks to seal includes the confidential design and
 16 functionality of Waymo’s proprietary autonomous vehicle system, including its LiDAR designs,
 17 which Waymo maintains as secret. I understand that these trade secrets are maintained as secret by
 18 Waymo (Dkt. 25-47) and that the trade secrets are valuable to Waymo’s business (Dkt. 25-31). The
 19 public disclosure of this information would give Waymo’s competitors access to descriptions of the
 20 functionality or features of Waymo’s autonomous vehicle system. If such information were made
 21 public, I understand that Waymo’s competitive standing would be significantly harmed.

22 5. Waymo’s request to seal is narrowly tailored to those portions of Waymo’s Offer of
 23 Proof that merit sealing.

6. I also understand that Defendants and/or third party Velodyne have designated certain information in Waymo's Offer of Proof as confidential and/or highly confidential under the Protective Order.

4 I declare under penalty of perjury under the laws of the State of California and the United
5 States of America that the foregoing is true and correct, and that this declaration was executed in San
6 Francisco, California, on August 24, 2017.

By /s/ Felipe Corredor
Felipe Corredor
Attorneys for WAYMO LLC

SIGNATURE ATTESTATION

13 Pursuant to Local Rule 5-1(i)(3), I attest under penalty of perjury that concurrence in the
14 filing of this document has been obtained from Felipe Corredor.

/s/ *Charles K. Verhoeven*

Charles K. Verhoeven